

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF ANDREW R.
KAUFMAN IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

I, Andrew R. Kaufman, declare:

1. I am an attorney in the law firm of Girard Sharp LLP. I am a member of the State Bars of Wisconsin and New York and am admitted to practice pro hac vice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY", Plaintiffs filed the following under seal:

Document	Description	Designating Party
[Unredacted] Plaintiffs' Opposition to Defendants' Motion to Transfer	Portion of briefing referring to documents designated confidential	Uber
Exhibit 2	Uber-produced document bates stamped UBER-MDL-3084-000067465	Uber
Exhibit 5	Uber-produced document bates stamped UBER000182883	Uber

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on June 13, 2025 in Milwaukee, Wisconsin.

3
4 /s/ Andrew R. Kaufman
5 Andrew R. Kaufman
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28